

^Solid Waste EIS - DOE

From: Sarah Donelson [sdonelson@earthlink.net]

Sent: Tuesday, June 10, 2003 7:06 AM

To: hswais@RL.gov

Subject: No More Waste at Hanford!

Mr. Collins –

- 1 | I am writing to express my grave concern about trucking nuclear waste on major thoroughfares shared by many citizens simply commuting to work or going about their daily lives. The radiation emissions are a public health hazard. In addition, adding more nuclear waste at Hanford, a site that is not designed to house such refuse and is so close to the Columbia River a thriving ecosystem, is not an answer and poses more danger than solutions.
- 2 | Please find better, safer choices for disposing of America's nuclear waste.

Sincerely,

Sarah Donelson
1510 Mill Street
Eugene, OR 97401

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From: SCN User [bg590@scn.org]
Sent: Tuesday, June 10, 2003 3:11 PM
To: hsweis@rl.gov
Subject: Additional comments on the _Revised Draft SWEIS_

- 1 | While the extension of the comment period was anything but adequate for anybody without a large staff to read and interpret this massive document, it did give me time to finish reading the 'responses' to my comments (I am Valerie Shubert, btw—I realize it's not obvious from my sig :-)), and to come close to finishing the responses to the agency comments, so I'll add some more specific comments to the print document I've already submitted, and my comments at the public meeting in Seattle.

 To begin with, there simply was not time to get to the main body of the document, or even 1/10 of the responses to comments. Therefore I have to take it on faith that the promised changes were incorporated; and that faith has been somewhat strained by earlier experiences: still, I have no choice but to assume that when a change is promised, it has been made. I'll be focusing on cases where changes were *not* promised, and where responses seem to me to be inadequate.
- 2 | In the case of the responses to the agency comments, essentially every question asked has been answered—sometimes with inadequate and evasive answers, to be sure, but there *are* answers, and it was something of an education to be able to read the comments, since often the official documents are so smooth and sugar-coated that it would seem there were no areas of controversy or disagreement at all—it was useful to see what the points of contention *were*, and to get actually adequate citations, particularly from Ecology, which often cited accessible documents, and adequately summarized what they required—quite a contrast to the citations in the main body of the *HSWEIS*, at least in the 1st draft.

 As to responses to comments by private individuals, I can only judge by the responses to my comments, as I hadn't time to get to anybody else's—the responses were inadequate in the extreme. Often whole sections of questions and comments were essentially acknowledged with a shrug—questions simply went unanswered.
- 3 | When they *were* answered, the answers and the questions were so badly matched that it was often difficult to tell what question was being answered--*sometimes* it was possible to tell from context, often not.

 Even when there were specific answers, they were often inadequate. The phrase "These details do not change the assessment documented in the HSW EIS" is repeated ad nauseum, with no explanations or justifications for the bald statement--*if* the questions had been given adequate consideration, it would not have been necessary to fall back on dismissive formula.
- 4 | On more specific points, I would like to focus on page 3.243 in the comment response volume. Here answers were somewhat more complete, but they didn't particularly profit thereby, for the threadbare text of insufficient study more adequately showed its holes when more complete answers were given.
- 5 | In response to a question about how long the site will be curated, the responder says that it will be under DOE control 'indefinitely'. Isn't this a rather too cavalier assertion of the immortality of bureaucracies? To date, no known bureaucracy has survived more than ~3000 yrs—and yet parts of this document, at least, purport to describe the future of the site out to 10,000 years from now—by which time the wastes at Hanford will *not* have become harmless—but the people who put them there will likely be long decayed themselves.
- 6 | In response to a question about non-renewable resources, only two new non-renewable resources have been added. Others (such as steel, and water), are either dismissed as not being 'major', or are asserted not to be at risk—a dubious argument at best, given the pollution to the groundwater that already exists.

E-0041 (contd)

- 7 | In response to a question about the longevity of asphalt, this is dismissed without answer as irrelevant, since (I'm paraphrasing here) 'nobody will ever dig that deep anyway'—a perilous assumption, and *not* an answer to the question.
- 8 | In response to a question about the long-term mutational effects of radionuclides, the answer makes clear that such a possibility has _never been assessed_.
- 9 | A long answer about 'beyond design basis accidents' (Beyond DBAs) ends with the statement that 'Beyond DBAs are not evaluated for external events'; a foolhardy policy, and no mistake. Considering only the risks from sub-critical extraterrestrial impactors, for example, the *Journal of the British Interplanetary Society* has devoted several issues to assessing the likelihood and consequences of subcritical impactors (see, for example, the Dec 1998 issue—if you haven't access to a copy, let me know and I'll send you a copy of the table of contents via s-mail, and copy any requested articles.) These discussions make a casual dismissal of external risks unpardonable—Hanford is not in an alternate universe somewhere, after all—it's on Earth, and millions of people live in its shadow in the event of a catastrophic failure.

I could multiply such examples a hundredfold, at least—or I could have, if the rest of the responses had been even as marginally adequate as those on this page; and if there'd been adequate time to *read* the document thoroughly, and to respond to it thoughtfully. So I end as I've begun—the comment period is _not long enough_—and one ten times as long might *barely* be adequate, given the mass of the documents involved. A cynical person might even conclude that this was the intention—that people were being hurried into a commitment that they'd be unwilling to make, given time for reflection—but we're none of us that cynical, are we? :-)

Val bg590@scn.org

I have a loaded question here, and I'm not afraid to ask it—George Frankly, Mathnet

E-0042

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From: Betsy Bell [betsybell@attbi.com]
Sent: Tuesday, June 10, 2003 3:51 PM
To: hsweis@RL.gov
Subject: Hanford waste

- 1 | Dear Michael Collins, I have been watching the developments in the Tri-Cities for years and am dismayed to learn that we could become, for real, the recipient of more toxic waste. Do you suppose it would be possible to clean up what is there in a responsible way first? And then maybe we could figure out if the Columbia River and the natural and human environment could safely receive more toxins. Thank you for your care for the health and safety of those who depend on your judgment.

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